

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 1:15-cr-290
	:	Hon Liam O'Grady
JOSE DEL TRANCITO GARCIA-TERUEL,	:	
	:	
Defendant.	:	

**DEFENDANT'S RENEWED OBJECTION TO UNITED STATES'  
MOTION FOR WITNESS DEPOSITION HEARING**

COME NOW, Jose Del Trancito Garcia-Teruel, through counsel, and renews his objection to the government's request for a Rule 15(a) hearing to depose a United States' cooperating witness. In its motion to reschedule the deposition hearing (Dkt. 349), the government included undersigned counsel availability for a hearing in late based on the government's request. However, the government failed to include Mr. Garcia-Teruel's stated and expressed continued objection to the deposition hearing and the proposed scheduling months before the November 9, 2021 trial date.

Therefore, undersigned counsel submits this renewed notice of Mr. Garcia-Teruel's objection to the witness deposition hearing and the proposed scheduling as the witness is not unavailable for trial, and the proffered testimony is immaterial. Furthermore, counsel will file a memorandum to this opposition for the Court's consideration.

Respectfully Submitted,  
Jose Del Trancito Garcia-Teruel  
By Counsel

/s/ \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2021, I will file the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties.

/s/

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